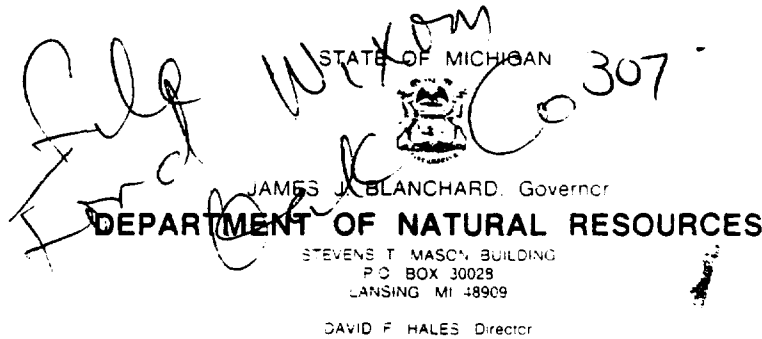


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February 2, 1990

Mr. Jerome S. Amber
Principal Staff Engineer
Stationary Source Environmental
Control Office
Ford Motor Company
15201 Century Drive, Suite 608
Dearborn, Michigan 48120

Dear Mr. Amber:

Thank you for your comments regarding the Proposed Priority List of Michigan Sites of Environmental Contamination for Fiscal Year 1991, pursuant to Act 307, P.A. 1982. I will address each of the specific sites you commented on in turn.

Spiegelberg L.F. - Livingston County

I am in agreement with you that circumstances at this site have changed substantially since it was last scored by the Michigan Department of Natural Resources (MDNR). Ms. Gruben confirmed your comments regarding excavation and removal activities. As a result, the site has been rescored to reflect the changes as follows:

The surface water, air, and direct contact routes have been eliminated to reflect that the sources of contamination previously present, which posed a threat of potential release to the environment, have been removed. However, the groundwater route remains in place as a route of potential exposure, with a documented plume of contaminated groundwater still remaining at the site. The score for this route increased because the remaining contamination at the site is a liquid, resulting in the release potential increasing to 2.0. The other category scores remained the same, except that existing exposure was eliminated. The Groundwater Route Subscore is 394.

The chemical hazard score dropped from 450 to 100. While the source of contamination, i.e., the paint sludge pit is gone, the contaminated groundwater plume and its associated chemical hazard threat must still be addressed. We did so by scoring the approximate area of the "former"



paint sludge pit, calculated to be .68 acres, under the chemical products industry section of Figure 29 of the SAS model, resulting in a score of 100.

The Spiegelberg site will be placed on List 2 with a score of 0494.

Old Ford Motor Company Dump - Dickinson County

I am in agreement with you that the surficial tar removal work completed in 1988 eliminated the surface water, air, direct contact, and fire and explosion potential exposure routes. This determination was reflected in the October 12, 1988 score. However, the Michigan Department of Natural Resources (MDNR) maintains its' position that the potential for groundwater contamination still exists and that the chemical hazard at the site is still very significant. Your comment that the City of Kingsford's public water supply is not at risk was also reflected in the 1988 score, in that, population at risk was given a score of zero. I will respond to your 1989 comments and EWA's interpretation of the SAS scoring model with the following brief analysis:

EWA assigned the physical state score a value of 1.0. This is incorrect. Figure 4.2 of the SAS model, states that landfills accepting industrial waste receive a physical state score of 1.5. This results in a release potential score of 1.5. Staff have reviewed and disagree with EWA's interpretive analysis of well logs and soil boring logs. Thus, the Route Subscore reflecting the potential for groundwater contamination remains at 213.

The list of identified chemicals EWA used in scoring chemical hazard could not be found in the sampling data in either Phase I or Phase II of their site investigation documents. The Department's 1988 chemical hazard score was based on a volume of waste calculated from data on pages 14-16 of the Phase II Investigation. This resulted in a maximum score of 450. In the interest of responding to your comments fairly, chemical hazard was rescored using Figures 25 and 26 of the SAS model, using the data appearing in Tables 6-10 of EWA's Phase I report. With the huge volume of waste and the levels of contaminants reported, a maximum score of 450 was again attained. The site will continue to be listed with a score of 663.

Ford Romeo Plant - Macomb County

I agree with your comment and the site name has been changed to "Ford Michigan Proving Grounds."

Ford Motor Company Wixom - Oakland County

The Northville District Office, has determined that the Ford Wixom site has not been fully remediated and the cleanup levels mutually agreed upon by Ford and the Department have not been met. We cannot delete this site from the list. Please contact Mr. Dipo Oyinsan of our Northville office (313-344-9440) to determine what further work needs to be accomplished in the cleanup of this site to make it eligible for delisting.

Apollo Lincoln Mercury - Washtenaw County

Our Jackson District Office has soil sampling analyses from July 18, 1989, (submitted by NTH Consultants, Inc.), which document soil contamination, with benzene, toluene, ethylbenzene, and xylene present in ppm levels. District staff have not received any documentation that this contaminated soil has been remediated. Consequently, we must include this site in the Final Priority List.

If you have any questions regarding my response to your comments, please call me.

Sincerely,



Ronald B. Willson
Act 307 Section
ENVIRONMENTAL RESPONSE DIVISION
517-373-4800

cc: Mr. Steve Harrington, Marquette District Office
Mr. Dipo Oyinsan, Northville District Supervisor
Mr. Gary Klepper, Jackson District Supervisor
Act 307 Section File